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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SONOMA**

In re:

JEFFREY TENNISON, and MICHELLE
TENNISON,

Debtors.

CASE NO.: 10-11824

Chapter 13

R.S. No. N/A

Confirmation Hearing:

Date: July 19, 2010

Time: 1:30 P.M.

Place: US Bankruptcy Court
99 South E. Street
Santa Rosa, CA 95404

**OBJECTIONS TO PROPOSED CHAPTER 13 AMENDED PLAN
AND CONFIRMATION THEROF**

Plaintiff SAFE-BIDCO ("Plaintiff"), Secured Creditor in the above-entitled bankruptcy Proceeding, hereby submits the following Objections to Confirmation of that certain Chapter 13 Amended Plan proposed by Debtor:

This objecting Secured Creditor holds a Commercial Loan Agreement and related Promissory Note secured by two written instruments titled "Guaranty" on the Debtors' property generally described as 19359 Coyle Springs Road, Hidden Valley Lake, Lake County, California.

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1 As of July 2010, the unpaid principal balance on the Loan, inclusive of accrued interest and
2 costs is in excess of \$25,000, representing monthly payments and late charges from May 2009
3 through July 2010; and attorneys fees' incurred with respect to the default. The plan does not
4 address the arrears so it cannot be confirmed.

5 Section 1325 of the Bankruptcy Code sets forth the requirements for confirmation of a
6 Chapter 13 Plan. Among other things, the Court must make a finding that the plan is feasible as a
7 condition to confirmation.

8 CONCLUSION

9 Any Chapter 13 Plan proposed by Debtors must provide for Secured Creditor's claim and
10 eliminate the Objections specified in the order to be reasonable and to comply with applicable
11 provisions of the Bankruptcy Code. It is respectfully requested that confirmation of the Debtor's
12 proposed Chapter 13 Amended Plan be denied and the case be dismissed.

13 WHEREFOR, Secured Creditor prays as follows:

- 14 (1) That confirmation of the proposed Chapter 13 Amended Plan be denied.
15 (2) For Dismissal of the Chapter 13 proceeding.
16 (3) For such other relief as this Court deems proper.

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18 Dated: July 12, 2010

19 JOHNSTON | THOMAS, An Association of Attorneys

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22 By /s/ Ryan Thomas
23 Ryan F. Thomas
24 Attorney for Plaintiff SAFE-BIDCO
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